

May 30, 2013

By Overnight Courier

Jocelyn Boyd, Chief Clerk and Administrator
Clerk's Office
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210



RECEIVED
2013 MAY 31 AM 8:23
SC PUBLIC SERVICE
COMMISSION

Re: Petition of the North American Numbering Plan Administrator on Behalf
of the South Carolina Telecommunications Industry for Relief of the 843
NPA

Dear Ms. Boyd:

Neustar, Inc., in its role as the North American Numbering Plan Administrator ("NANPA"), hereby submits for filing a petition on behalf of the South Carolina telecommunications industry for relief of the 843 area code. Enclosed please find the original and one copy of the Petition. Please date-stamp the return copy as received and return it in the enclosed self-addressed stamped envelope.

If you have any questions regarding this matter, please contact the undersigned at (202) 533-2912.

Respectfully submitted,



Kimberly Wheeler Miller
Counsel, North American Numbering Plan
Administrator, Neustar, Inc.
Kimberly.miller@neustar.biz

cc: Jim McDaniel, Office of Regulatory Staff

Before the
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
Columbia, South Carolina 29210

In the Matter of the Petition of)
Neustar, Inc., on Behalf of the South Carolina)
Telecommunications Industry, For Approval of)
NPA Relief Plan for the 843 NPA)

2013-207C
244336

Docket No. _____

SC PUBLIC SERVICE
COMMISSION

2013 MAY 31 AM 8:23

RECEIVED

PETITION OF THE
NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR
ON BEHALF OF THE SOUTH CAROLINA TELECOMMUNICATIONS
INDUSTRY FOR RELIEF OF THE 843 NPA

Neustar, Inc., the North American Numbering Plan Administrator (“NANPA”), in its role as the neutral third party NPA Relief Planner for South Carolina under the North American Numbering Plan and on behalf of the South Carolina telecommunications industry (“Industry”),¹ petitions the Public Service Commission of South Carolina (“Commission”)² to approve the Industry’s consensus decision³ to recommend to the Commission an all services distributed overlay (referred to as Alternative #1) of the 843 numbering plan area (“NPA”) as the preferred form of relief for the 843 NPA.⁴ The Industry submits its recommendations to the Commission based upon NANPA’s projections that absent NPA relief, the supply of central office codes (often referred to as

¹ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 843 area code of South Carolina.

² The Federal Communications Commission (“FCC”) delegated authority to review and approve NPA relief plans to the states. See 47 C.F.R. § 52.19.

³ Consensus as used in this document means: Consensus is established when substantial agreement has been reached among those participating in the issue at hand. Substantial agreement means more than a simple majority, but not necessarily unanimous agreement. Operating Procedures for ATIS Forums and Committees, §7.1 (ATIS Feb. 22, 2012).

⁴ As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry.

“CO” or “NXX” codes) for the 843 NPA will exhaust during the fourth quarter of 2015.⁵

In order to allow sufficient time for completion of the selected relief plan prior to exhaust of CO codes in the 843 NPA and to fully implement customer education plans, the Industry recommends that the Commission approve the recommended 13-month implementation schedule. In support of this petition and on behalf of the Industry, NANPA submits the following:

I. BACKGROUND

Based upon the projected exhaust date at the time,⁶ NANPA notified the Commission and the Industry on January 4, 2013 that NPA relief needed to be addressed.⁷ NANPA met with members of the Industry on February 4, 2013 to solicit Industry input on the proposed relief plans and again on March 21, 2013 to discuss the proposed relief alternatives and to allow the industry to arrive at a consensus on the relief alternative to recommend to the Commission.⁸

Pursuant to the NPA Relief Planning Guidelines, NANPA distributed an Initial Planning Document (“IPD”) to the Industry prior to the March 21, 2013 meeting. The

⁵ April 2013 NRUF and NPA Exhaust Analysis (“2013 NRUF Report”). The 2013 NRUF Report can be accessed on the NANPA website at <http://www.nanpa.com>.

⁶ The October 2012 Number Resource Utilization Forecast (NRUF) and NPA Exhaust Analysis (“2012 NRUF Report”) published by NANPA indicated that the 843 NPA would exhaust during the first quarter of 2016. October 2012 NRUF and NPA Exhaust Analysis (“2012 NRUF Report”). The 2012 NRUF Report can be accessed on the NANPA web site at <http://www.nanpa.com>.

⁷ NANPA is responsible for initiating area code relief in sufficient time to prevent exhaust of numbering resources before relief is implemented, typically 36 months prior to exhaust.

⁸ In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, Sep. 30, 2011) (“NPA Relief Planning Guidelines”). The NPA Relief Planning Guidelines assist NANPA, the Industry and regulatory authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS website located at www.atis.org/inc/incguides.asp.

IPD contained descriptions, maps, general facts and assumptions, and the projected lives of the area code relief options, which consisted of an all services overlay, and a two-way geographic split. Descriptions of the two alternatives are:⁹

- Alternative #1 – All-Services Overlay: A new NPA code would be assigned to the same geographic area as the existing 843 NPA. This alternative has a projected life of 28 years. Customers would retain their current telephone numbers. Ten-digit dialing by all customers between and within area codes in the area covered by the new area code would be required.
- Alternative #2 – Two-Way Geographic Split: In a two-way geographic split, the NPA is split into two geographic areas and a new NPA is assigned to one of the areas formed by the split. In Alternative #2, the proposed split boundary line runs west to east between Pineville and Greelyville rate centers on the west and between Georgetown and McClellanville on the east. Area A is north of the line and is projected to exhaust in 29 years. Area B is south of the boundary line and its projected life is 27 years.

The March 21, 2013 meeting attendees reviewed the attributes of the relief alternatives described above. The Industry members reached consensus to recommend Alternative #1, the all-services distributed overlay plan, to the Commission as the preferred method of relief for the 843 NPA.

II. DESCRIPTION OF THE RECOMMENDED RELIEF ALTERNATIVE

Alternative #1, the all-services distributed overlay, would superimpose a new NPA over the same geographic area covered by the existing 843 NPA. All existing customers would retain the 843 area code and would not have to change their telephone numbers. The projected life of the NPA is 28 years. Consistent with FCC regulations, customers will dial 10 digits for all local calls.¹⁰

⁹ The March 21, 2013 meeting minutes are attached as Exhibit A. A copy of the January 4, 2013 notice of relief including the IPD is attached as Exhibit B. The IPD and March 21 meeting minutes contain further descriptions and illustrative maps of the alternatives considered by the Industry participants.

¹⁰ 47 C.F.R. §52.19(c)(3)(ii).

The table below sets forth the Industry recommended dialing plan for Alternative

#1:

Overlay Dialing Plan for Alternative # 1:

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA) or Foreign NPA (FNPA)	10-digits (NPA-NXX-XXXX)*
Toll Call	HNPA or FNPA	1+10-digits (1+NPA-NXX-XXXX)
Operator Services	HNPA or FNPA	0+10-digits (0+NPA-NXX-XXXX)

* 1 + 10 digit dialing for all HNPA and FNPA calls also permissible at each service provider's discretion.

Industry participants reached consensus to recommend to the Commission a 13-month schedule for implementation of the overlay. The recommended schedule is as follows:

Intervals for Alternative # 1 – Overlay


EVENT	TIMEFRAME
Total Implementation Interval	13 months
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period (Calls within 843 NPA can be dialed using 7 or 10 digits) Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
First Code Activation after end of Permissive dialing period. (Effective date for codes from the new NPA)	1 month (after Mandatory Dialing Period)

The Industry requests that the Commission approve this timeline in order to ensure the timely implementation of relief and to facilitate customer education.

III. CONCLUSION

The Industry respectfully requests that the Commission issue an order approving the Industry's recommended method and schedule for relief for the 843 NPA.

Respectfully submitted,



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May 30, 2013

EXHIBIT A

**SOUTH CAROLINA 843 NPA
INITIAL RELIEF PLANNING
INDUSTRY MEETING
VIA CONFERENCE CALL**

**March 21, 2012 - 11:30 AM (ET)
BRIDGE: (630) 827-6799; PASSCODE: 8831535 #**

AGENDA

Welcome, Introductions, Consensus Definition / Statements for the record

NANPA's Role and Responsibilities

Review of 843 NPA Background, History and Status

Review of Initial Planning Document and Proposed Relief Alternative

New Alternatives from Industry Participants

Discussion of Relief Alternatives

Elimination of Alternatives

Consensus on Relief Alternative and Dialing Plan

Consensus on Implementation Intervals

Consensus on Filing of Documents with the Commission

Statements for the Record

Set Date to Approve Minutes

Open Discussions

Adjourn

INDUSTRY CONSENSUS PROCESS

2/22/2012

ATIS OPERATING PROCEDURES

VERSION 5.2

7 RESOLUTION PROCESS

7.1 Consensus

Consensus is the method used by the ATIS Forums to reach resolution of Issues, unless specifically otherwise provided for in these Operating Procedures.

Consensus is established when substantial agreement has been reached among those participating in the Issue at hand. Substantial agreement means more than a simple majority, but not necessarily unanimous agreement.

Consensus requires that all views and objections be considered, and that a concerted effort be made toward their resolution. Observers shall have the opportunity to express their views and to influence the opinions of Voting Members. However, the opinions of Observers are not considered by the leadership in determining whether consensus has been achieved. Under some circumstances, consensus is achieved when the minority no longer wishes to articulate its objection. In other cases, the opinions of the minority should be recorded with the report of the substantial agreement, or consensus, of the majority.

When there are questions or disputes regarding consensus, leaders or participants should ask an objecting participant(s) to state the rationale for the objection and provide an opportunity for full discussion aimed at achieving full understanding and consideration of the objection.

A participant's silence is perceived as agreement by the committee and its leadership. If participants do not agree, they should be encouraged to speak up and voice their opinion.

Attachment 2
South Carolina
NPA 843 NXX Summary
Data as of February 27, 2013

NPA	843					
Assigned NXXs	708					
Protected NXXs	0					
Reserved NXXs	0					
Unavailable NXXs	22	See Note				
Available NXXs	70					
Total	800					
<u>Codes Assigned NPA 843</u>	<u>Jan 08</u>	<u>Feb 08</u>	<u>Mar 08</u>	<u>Apr 08</u>	<u>May 08</u>	<u>Jun 08</u>
	2	0	1	1	2	3
	<u>Jul 08</u>	<u>Aug 08</u>	<u>Sep 08</u>	<u>Oct 08</u>	<u>Nov 08</u>	<u>Dec 08</u>
	2	0	4	2	1	1
	<u>Jan 09</u>	<u>Feb 09</u>	<u>Mar 09</u>	<u>Apr 09</u>	<u>May 09</u>	<u>Jun 09</u>
	0	4	1	2	0	0
	<u>Jul 09</u>	<u>Aug 09</u>	<u>Sep 09</u>	<u>Oct 09</u>	<u>Nov 09</u>	<u>Dec 09</u>
	0	0	0	0	0	3
	<u>Jan 10</u>	<u>Feb 10</u>	<u>Mar 10</u>	<u>Apr 10</u>	<u>May 10</u>	<u>Jun 10</u>
	2	3	0	2	0	1
	<u>Jul 10</u>	<u>Aug 10</u>	<u>Sep 10</u>	<u>Oct 10</u>	<u>Nov 10</u>	<u>Dec 10</u>
	2	0	0	0	1	0
	<u>Jan 11</u>	<u>Feb 11</u>	<u>Mar 11</u>	<u>Apr 11</u>	<u>May 11</u>	<u>Jun 11</u>
	0	1	0	1	0	0
	<u>Jul 11</u>	<u>Aug 11</u>	<u>Sep 11</u>	<u>Oct 11</u>	<u>Nov 11</u>	<u>Dec 11</u>
	0	1	0	3	0	0
	<u>Jan 12</u>	<u>Feb 12</u>	<u>Mar 12</u>	<u>Apr 12</u>	<u>May 12</u>	<u>Jun 12</u>
	0	1	3	0	0	0
	<u>Jul 12</u>	<u>Aug 12</u>	<u>Sep 12</u>	<u>Oct 12</u>	<u>Nov 12</u>	<u>Dec 12</u>
	0	0	1	1	0	1
	<u>Jan 13</u>	<u>Feb 13</u>				
	5	1 *				
* through 2/27/13						
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).						

ATTACHMENT 3

POOLING STATISTICS	
<i>Provided By: Cecilia McCabe</i>	
ST/NPA:	SC 843
MEETING DATE:	3/21/2013
MEETING SUBJECT:	
<i>Relief Planning</i>	X
<i>Jeopardy</i>	
<i>Jeopardy Status Review</i>	
<i>Other</i>	
POOL START DATE (PSD)	2/19/2003
RATE CENTERS	
<i># Total</i>	92
<i># Mandatory</i>	12
<i># Mandatory-Single Service Providers (M*)</i>	10
<i># Optional</i>	62
<i># Excluded</i>	8
BLOCKS ASSIGNED	
<i># Total</i>	207
<i>(For time period 02/01/12 - 02/01/13)</i>	
BLOCKS AVAILABLE	
<i>#Total</i>	841
<i>(As of preparation date: 02/01/13)</i>	
CODES ASSIGNED	
<i># Total</i>	10
<i># for Pool Replenishment</i>	4
<i># for Dedicated Customers</i>	0
<i># for LRNs</i>	6
<i>(For time period 02/01/12 - 02/01/13)</i>	
CODES FORECASTED	
<i># Total</i>	11
<i># for Pool Replenishment and Dedicated Customers</i>	11
<i># for LRNs</i>	0
<i>(For the next twelve months as of: 02/01/13)</i>	

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 9/30/11

This meeting aid is prepared to assist the participants in understanding basic steps and considerations in NPA Relief Planning and the criteria established to determine if relief alternatives are viable.

Section:

- 2.6 The ATIS consensus process will be employed in selecting an industry relief recommendation to ensure that the plan that does not favor a particular interest group.
- 2.12 Once there is an approved relief plan, all code holders, block holders, and the Pooling Administrator (PA) in the exhausting NPA shall take the appropriate steps to facilitate the implementation of the plan.

Section:

5.0 NPA Relief Planning Process

The NRUF and other available resources are used to identify projected NPA exhaust. NANPA shall prepare relief options for each NPA projected to exhaust within thirty-six months.

Considerations in the NPA Relief Planning Process include:

Sub -A - The relief options shall cover a period of at least five years beyond the predicted date of exhaust, and shall cover more than one relief activity, if necessary, during the time frame.

Sub -E - For each relief activity proposed in the plan, it is recommended that customers who undergo number changes shall not be required to change again for a period of 8-10 years.

Sub -F - The use of protected codes (NXXs) is an assignment practice whereby a central office code assigned in one NPA is not available for assignment in an adjacent NPA in order to permit 7 digit dialing across the NPA boundary. The use of protected codes (NXXs), which permits 7-digit dialing across NPA boundaries, should be eliminated as part of the NPA code relief planning process unless the appropriate regulatory authority directs otherwise.¹

¹ Per letter dated 10-29-97 from NANC Chairman to INC Moderator.

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 9/30/11

Sub -G - The use of protected routes, which also permits 7-digit dialing across NPA boundaries, shall continue unless otherwise directed by the appropriate regulatory authority.² Where it is suspected that protected routes and 7-digit dialing cross-boundary exists, NANPA shall continue the code assignment practices that permit the continued protection of these routes until such time as these routes are eliminated by the service provider(s) or the appropriate regulatory authority. Any changes in rate centers or NXXs that would increase or decrease protected routes shall be reported to NANPA by the service provider initiating the change. The notification shall include the tariff, the rate centers and NXX codes involved and the direction of the 7-digit local calling. This notification is important since such changes may have code consumption implications on multiple NPAs.

Sub -H - In the long term, the plan shall result in the most effective use possible of all codes serving a given area. Ideally, all of the codes in a given area shall exhaust about the same time in the case of splits. In practice, this may not be possible, but severe imbalances, for example, a difference in NPA lifetimes of more than 10 years, shall be avoided.

- 5.1 Determine the Expected NPA Exhaust Period - Through the use of historical growth data as well as expected changes (e.g. pooling) to NXX demands in the future, NANPA should project to the best of its ability the expected quarter of exhaust of the NPA. Every practical source of data, including the NRUF survey results should be used as an aid in this projection. Projection results should be reported to the industry as soon as the NRUF or other analysis results are available. Once the earliest likely exhaust date is determined, NANPA should suggest a mandatory dialing date six months prior to the exhaust date if the recommended relief is an overlay. If the recommended relief is a geographic split, the end of the recorded announcement period should be at least six months prior to the earliest likely exhaust date.
- 5.3 Define the Attributes of Each Alternative or Method - For each of the alternative relief methods identified in 5.2, NANPA should, with assistance from the industry participants, quantify impacts to subscribers, networks and service providers and industry concerns using Appendix B. Specific calculations such as the relative lengths of the relief periods, local dialing plans using 7-digits or 10-digits, and if available the number of subscribers requiring number changes should be made at this point. Any known technical and

² In the case of an NPA overlay, cross NPA boundary calls originating from the overlay must be dialed on a 10-digit basis.

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 9/30/11

operational impacts should also be identified by service providers including items such as required switch replacements and support system modifications.

- 5.4 Notify Industry of Pending NPA Exhaust and Results of Initial Relief Planning - The next step in the NPA Relief Planning Process is to incorporate the results of the steps outlined in 5.1 through 5.3 into an Initial Planning Document (IPD) for distribution to the Industry in the affected NPA. The IPD should be attached to a letter notifying Industry members of future meeting schedules to be held for the purpose of discussing the alternative relief methods, with the objective of reaching consensus on the method to be adopted. The IPD should be provided at least four weeks prior to the first industry meeting to allow individual industry members to fully analyze the alternatives.

- 5.5 Conduct Industry Meetings with the Goal of Reaching Industry Consensus on a Relief Plan – Meetings and/or conference calls should be held with all interested members of the industry within the affected NPA. When a meeting notice is issued, NANPA will state that an SP requesting a conference bridge must notify the meeting host to make arrangements (e.g., equipment, bridge number, cost of call). In order to keep the meeting manageable, participants on the bridge will not be accorded special consideration³. NANPA will moderate these meetings or conference calls and will be fully prepared to answer questions regarding the alternatives. During the meetings/conference calls, new alternatives may be proposed and must be considered in these discussions. Inasmuch as the objective of these meetings is to reach industry consensus, subsequent joint meetings will be held as required until consensus is reached, or until NANPA determines consensus cannot be reached.

In discussing the alternatives, issues such as new NPA boundaries, local calling areas, protected codes, regulatory issues, customer education, 911 issues, and the length of any necessary permissive dialing period should be considered.

All meetings and/or conference calls should be fully documented in meeting minutes, which are to be made available to the local industry within two weeks after the meeting/conference call and no less than one week prior to a subsequent meeting or call

³ Caveat: those on the bridge may NOT ask for comments to be repeated or for additional explanations to be given because they cannot see what's happening in the room. The use of a bridge must not slow down the meeting.

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 9/30/11

unless otherwise agreed. Copies of meeting minutes may also be forwarded to the appropriate regulatory body.

5.6 **Notify Appropriate Regulatory Body - When consensus is reached within the industry or when NANPA determines additional meetings would not achieve consensus, NANPA should submit to the appropriate regulatory body (or bodies) the results of the industry effort, if required. In its submission NANPA should also furnish all relevant background information including any statements for the record submitted in real time by industry participants (unless otherwise agreed), meeting minutes, mailing lists, etc. In the case where consensus could not be reached, brief position papers could be included.**

5.7 **Approval by Appropriate Regulatory Body – When the regulator issues an order for NPA relief, NANPA shall confirm the approved plan meets the criteria for assignment as set forth in this document. If the approved plan meets the criteria, NANPA will assign a new NPA within one week of receipt of the approved plan. If the approved plan does not meet the criteria for assignment, NANPA will suspend the assignment pending FCC direction.**

5.8 **Public Statements/Press Releases - Public statements released prior to the first industry NPA relief planning meeting should, to the extent available, contain:**

- factual information about the impending exhaust of the NPA
- and that questions concerning the relief effort may be directed to the NANPA

During the relief planning process, public statements are not encouraged. However, some states may require input from the public to the planning process. If questions are directed to the NANPA, or if reaction to a press article is warranted, responses should, to the extent possible, be limited to factual information (as opposed to opinion or preference) concerning relief options being considered and to agreements reached by the industry that are in the public record.

Within two weeks of the NPA assignment NANPA will issue a press release informing the public of this action. NANPA need not issue that press release if the regulatory authority wishes to do so instead. Information that may be incorporated with this notification includes a map indicating new NPA boundaries and new dialing procedures

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 9/30/11

(if any).

- 5.9 **Industry NPA Relief Implementation Meeting - NANPA will host and facilitate an Industry NPA Relief Implementation meeting via conference call following the final acceptance of a relief plan.** [NANPA, on their own initiative or using input from Service Providers, has the option to convene a face-to-face meeting if the chosen plan presents unusual implementation factors.] **The meeting shall occur no more than 45 days following the assignment of a new NPA.** The agenda for the industry implementation meeting should include relevant dates, milestones, customer education, press releases, provision of test numbers, Planning Letter content and subsequent industry communication regarding implementation issues.
- 5.10 **Planning Letter – NANPA shall post a Planning Letter to its website informing the public and the industry of pending NPA relief no more than three weeks after the initial implementation meeting.** If regulatory approval of the implementation plan with interval dates is required, the Planning Letter will be published within 10 business days of regulatory approval. If an additional implementation meeting is required, the Planning Letter will be published within 3 weeks of the additional implementation meeting.

This notice should include a full disclosure of the associated testing period, permissive dialing period, affected NXXs, rate centers, records conversion dates and the beginning date for mandatory dialing of the new NPA (See time line Appendix C). Also included should be a test number for routing verification, the date it will become available and the disconnect date. Other information that may be incorporated with this notification includes a map indicating new NPA boundaries, new dialing procedures (if any) and a NANPA contact name and telephone number. Service providers that are code and/or block holders within the affected NPA should provide to the NANPA their company's NPA Relief Project Coordinator's contact information for inclusion in the company contact section of the Planning Letter.

Relief Planning Meeting Aid

Excerpts from the NPA Code Relief Planning & Notification Guidelines, ATIS-0300061 – 9/30/11

Appendix B

Issues To Be Considered During NPA Relief Planning

Following are a list of issues to be considered in weighing the advantages of the relief alternatives.

Subscribers

- * quantity of subscribers who will have to undergo number changes
- * impact on customer premise equipment (CPE), e.g., reprogramming of wireless devices, automatic dialers, alarm systems, PBXs, etc.
- * public reaction to and political involvement in boundary decisions
- * impact on market identity/recognition, geographic identity, public familiarity
- * public costs such as stationery, business cards, advertising, CPE and database reprogramming.

Network and Service Providers

- * hardware and software upgrades to switching systems
- * modification to or replacement of some operations support systems
- * modification to operator services switches and/or systems
- * directory assistance impacts
- * 911 system impacts
- * directory changes
- * public notification/education requirements
- * changes to existing network routing and translations
- * impact of permissive dialing period
- * length of planning period
- * impact on dialing plan
- * experience with relief method/implementation procedure
- * interaction with appropriate regulatory bodies
- * tariff impacts
- * internal networks
- * LNP compliance impacts

Industry Concerns

- * length of relief period
- * NPA code utilization
- * Number Pooling impact on length of relief period (where applicable)

NPA RELIEF PLANNING MEETING AID

INDUSTRY DEVELOPED PROS AND CONS FOR RELIEF ALTERNATIVES FROM RECENT NPA RELIEF PLANNING MEETINGS

Overlay Pros and Cons:

Pros:

Alternative #					
				1	
					1 All existing customers would retain the ____ area code and would not have to change their telephone numbers.
					2 Does not discriminate against customers on different sides of a boundary line as does a geographic split
					3 Easier education process
					4 Less customer confusion and easier education process
					5 Less financial impact to business customers because there is no need to change signage, advertising and stationery
					6 Less financial impact on business customers because there is no need to change signage, advertising and stationery unless they currently only show 7-digit numbers.
					7 Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers.
					8 Customers do not have to update personal printed material such as checks and websites, etc.
					9 Provides the most efficient distribution of numbering resources by allowing assignments to follow demand not withstanding forecasts for growth
					10 No need for synchronization of old and new NPAs in NPAC databases
					11 Minimizes call routing issues, especially with ported numbers
					12 Easier for service providers to implement from a translations, billing and service order system perspective
					13 Minimal data entries handled in national databases such as BIRRDs, LERG and the Terminating Point Master Table
					14 The PSC/PUC would not have to decide which side gets the new NPA, so no winners and losers.
					15 Does not split cities or counties into different area codes.
					16 Keeps communities of interest in tact.
					17 No impact on some wireless carriers that have to reprogram handsets manually
					18 No technical impacts to number portability, text messaging or multimedia messaging
					19 Meets the requirements of the INC NPA Code Relief Planning and Notification Guidelines.

						20 No impact to non-telephone company databases that use the full ten-digit telephone number as a search criteria, i.e. airlines, doctors, utilities, grocery reward programs, pharmacies, National Missing Children Database, etc.
--	--	--	--	--	--	---

Overlay Pros and Cons:

Cons:

Alternative #					
					1
					1 Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the ____ NPA and the new NPA.
					2 Financial costs to add NPA to signage and printed material where only 7-digit number is shown.
					3 Customers need to reprogram phone systems for 10-digit dialing: faxes, alarms, etc.
					4 Customers would have to reprogram any auto-dialing equipment currently programmed to dial 7-digits to dial 10-digits; equipment such as alarm systems, PSAP dial systems, security gates, PBXs, life safety systems, computer modems, voicemail systems, fax machines, etc.
					5 Loss of geographic identity with an overlay.
					6 Confusion between local and toll calling – 10-d Vs 1+10-d in some states.

NPA Split Pros and Cons

Pros:

Alternative #					
					1 Customers retain seven-digit dialing for all calls within the same NPA.
					2 Maintains seven digit dialing for local calls within the same NPA
					3 Approximately ½ of customers would experience no change if they keep the ____ NPA
					4 Projected lives are balanced
					5 The projected lives are slightly more balanced than alternative # .
					6 The projected lives are more balanced
					7 Projected life-spans of NPAs are more balanced
					8 This alternative allows _____ to maintain operations on one side of the split line.

					9	_____ operating territory is kept in tact
					10	Allows _____ to retain 7 digit dialing in their operational area calling service
					11	Retains the geographic identity with one area code.
					12	Keeps the cities on both sides of the split lines intact.

NPA Split Pros and Cons:

Cons:

Alternative #						
					1	Splits _____ operating territory between two NPAs
					2	_____ EAS calling is heavily disrupted
					3	Heavily disrupt _____ operational calling area
					4	Projected lives are imbalanced, _ years difference, least balanced of the split alternatives, could become more imbalanced if demand changes in future years
					5	Projected lives are severely imbalanced, __ years difference, could become more imbalanced if demand changes in future years
					6	Projected lives are severely imbalanced, __ years difference, could become more imbalanced if demand changes in future years. Furthermore, does not meet the NPA Relief Planning and Notification Guidelines.
					7	Requires approximately ½ of ____ NPA customers to change their telephone numbers thus creating winners and losers.
					8	Requires NPA change for approximately ½ of ____ NPA customers
					9	Requires half of the businesses to incur costs to change their advertising for telephone #'s and stationery.
					10	Split may impact service providers operating territory between two NPAs
					11	Financial impact to half of businesses to incur costs to change their advertising for telephone #'s and stationery if currently show 10-digit telephone numbers or are close to the split line.
					12	Creates widespread customer 10-digit dialing confusion across the new NPA boundary.
					13	All ____ NPA customers previously went through a split _ years ago and half will have to change again
					14	Difficult PSC/PUC decision on which side retains the old NPA.
					15	Longer time period needed for service providers to implement this type of relief.

					16 Customers whose numbers change must contact friends, family and business associates with the telephone changes.
					17 More complicated and costly to implement for service providers in their billing, translations and database systems.
					18 Splits affect alarm systems and E-911 databases.
					19 Negative impacts to E911, industry and alarm system databases that must be updated with customers' new telephone numbers.
					20 Negative impact to directories and directory assistance databases that must be updated with customers' new telephone numbers.
					21 Negative impact to directories and directory assistance databases and other non-telephone company databases that use the full ten-digit telephone number as a search criteria, i.e. airlines, doctors, utilities, grocery stores, pharmacies and the National Missing Children's database that must be updated with customers' new telephone numbers.
					22 Timing of publication of telephone directories must be coordinated with the implementation of the new NPA.
					23 Split has a larger impact to greater number of existing customers due to change in existing customers' telephone numbers.
					24 Split requires significant changes to service provider's operational support systems and network elements.
					25 Splits cause customer confusion with caller ID during implementation.
					26 Older wireless handsets without over-the-air programming must be manually programmed for those numbers that are changing.
					27 Splits require the old and new NPAs to be synchronized with the NPAC database to ensure accurate call routing and facilitation of port requests.
					28 Splits require a more challenging customer education process for service providers that have customers on both sides of the split line.
					29 This split disrupts the SP's host-remote switch arrangement.
					30 This split may disrupt the service provider's host-remote switch arrangement.
					31 Splits require the 800/SMS database to be updated.
					32 Splits reduce the geographic area served by one area code.
					33 Splits the city(s), counties or legislative districts into different area codes.
					34 Splits communities of interest.
					35 For some wireless carriers, text messaging and multimedia service can only handle one version of the 10-digit number so they will fail if they are sent using the old area code during

					permissive dialing.
					36 The projected lives of the NPAs for any split alternative for ___ relief may be inflated and appear to last longer than they really will because NANPA's model does not take into account the significant amount of 7 digit local dialing across NPA boundaries within Kentucky and to other states. This dialing arrangement limits where central office codes can be assigned within all impacted NPAs, resulting in a less efficient use of resources.

OVERLAY DIALING PLAN MEETING AID

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) or Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX)*
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services <small>Credit card, collect, third party</small>	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

*1+10 digit permissible at each service provider's discretion

OVERLAY IMPLEMENTATION SCHEDULE MEETING AID

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period <i>(Calls within 843NPA can be dialed using 7 or 10 digits)</i> Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
First Code Activation after end of Permissive dialing period <i>(Effective date for codes from the new NPA)</i>	1 month (after Mandatory Dialing Period)
Total Implementation Interval	13 months

GEOGRAPHIC SPLIT DIALING PLAN MEETING AID

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA)	7 digits (NXX-XXXX)
	Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX)
Toll call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services <small>Credit card, collect, third party</small>	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

GEOGRAPHIC SPLIT IMPLEMENTATION SCHEDULE MEETING AID

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive dialing to the old or new NPA and Customer Education Period <i>(Calls within the home NPA can be dialed using 7 or 10 digits. Calls using the old or new NPA to those changing to the new NPA are acceptable)</i> Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
Recorded Announcement Period	3 months
First Code Activation <i>(Effective date for codes from the new NPA)</i>	End of Recording Period
Total Implementation Interval	15 months

Initial Planning Document
For
Relief of South Carolina 843 NPA

March 21, 2013

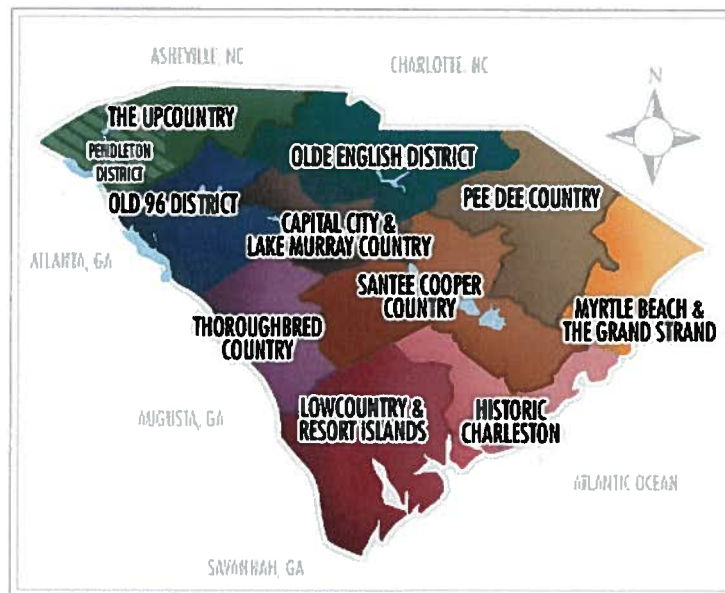
North American Numbering Plan Administration

Thomas C. Foley
Senior Manager – Data Analysis

History of the Area and of the 843 NPA

South Carolina was one of the original Thirteen Colonies. It became a state on May 23, 1788 thus becoming the eighth state.

The 843 NPA covers the east costal area of South Carolina. The area includes all, or part of, 21 counties. It includes the cities of Charlestown, Hilton Head, Myrtle Beach, and Florence. The tourism areas are highlighted below.

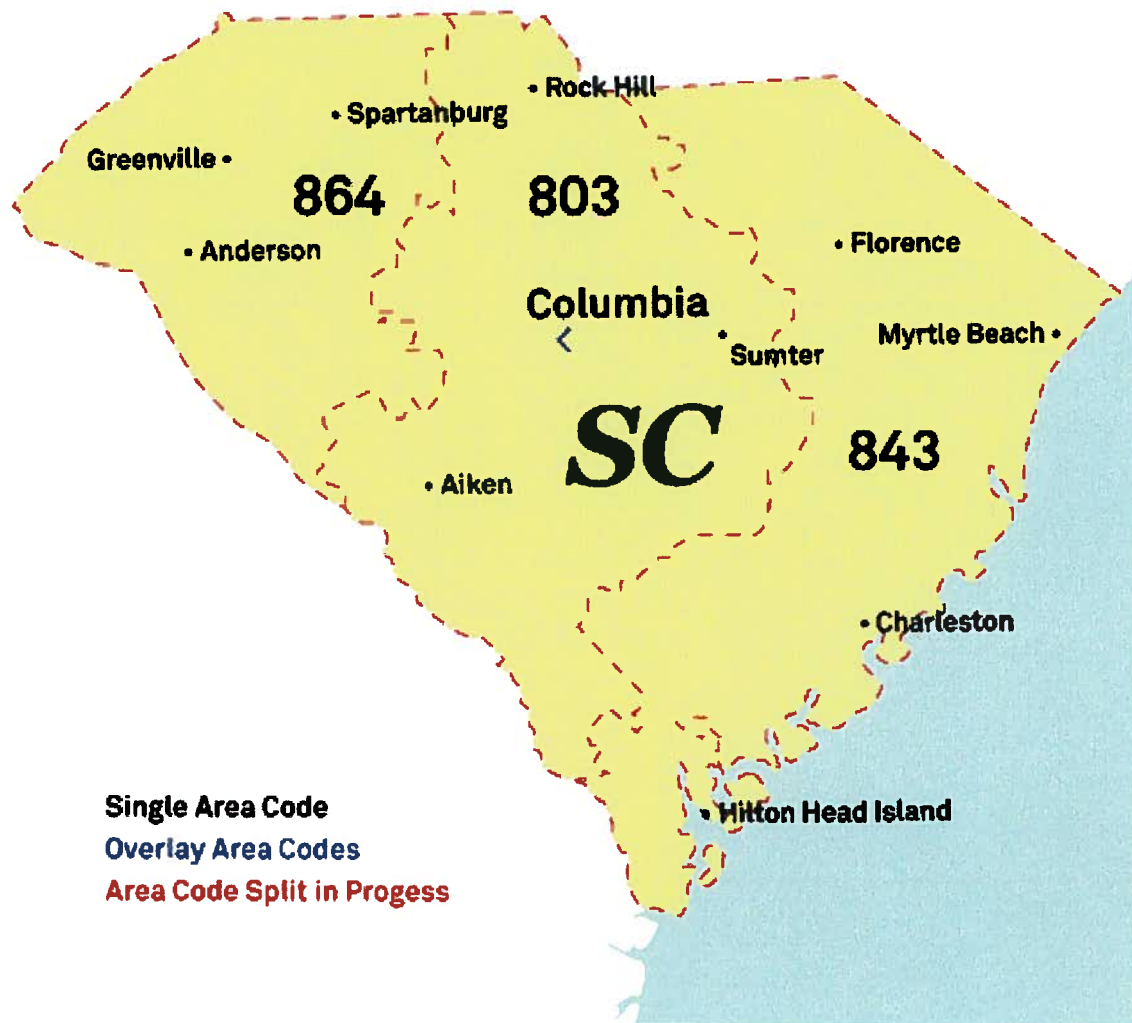


The NPA was placed in service in 1998. It was split from the 803 NPA. The 803 NPA had previously split in 1995 creating the 864 NPA in the west. Shortly after its creation, forecasts from carriers for the 843 NPA indicated phenomenal growth, up to 5 codes per month. The projected exhaust was put in 2003. Relief planning was commenced and in 2000. NANPA, on behalf of the industry, presented the Commission with the industry plan later in that year. Shortly after, demand for codes decreased and the relief postponed.

Appendix E**General Attributes of the Most Common Relief Alternatives**

Geographic Splits	All-Services Overlays
<ul style="list-style-type: none">• Splits maintain a single area code for each geographic area. This may minimize confusion for customers outside the area.	<ul style="list-style-type: none">• With an overlay there will be more than one area code in a geographic area.
<ul style="list-style-type: none">• Splits require an area code change for approximately one-half of customers in a two-way split, and two-thirds of customers in a three-way split.	<ul style="list-style-type: none">• An overlay will not require existing customers to change their area code.
<ul style="list-style-type: none">• Geographic splits permit 7-digit dialing within an area code.	<ul style="list-style-type: none">• An overlay requires customers to dial 10 digits (or 1 + 10 digits) for all calls.
<ul style="list-style-type: none">• Stationery, business cards and advertising, as well as non-telephony databases, containing a ten-digit phone number will need to be revised by customers receiving the new area code.	<ul style="list-style-type: none">• There is no need to revise stationery, business cards and advertising, as well as non-telephony databases, unless they contain only seven digit phone numbers.
<ul style="list-style-type: none">• Future splits will reduce the geographic size of the area code.	<ul style="list-style-type: none">• An overlay will end further shrinking of the geographic size of the area code because subsequent relief will likely be another overlay.

South Carolina Area Codes



RATE CENTER TABLE

STATE: SOUTH CAROLINA

NPA: 843

NXX Data as of 12/31/2012

Rate Center Name	Count of NXXs
ANDREWS	2
AWENDAW	1
AYNOR	1
BEAUFORT	26
BENNETTSVL	7
BETHUNE	1
BLENHEIM	4
BLUFFTON	12
BONNEAU	1
CHARLESTON	171
CHERAW	9
CHESTERFLD	4
CLIO	3
COLLINSCK	6
CONWAY	12
COTTAGEVL	2
CROSS	1
DARLINGTON	6
DILLON	8
EASTCONWAY	8
EDISTO IS	4
FLORENCE	56
FLOYDS	2
FOLLYBEACH	4
GEORGETOWN	15
GREELEYVL	3
HARDEEVL	4
HARLEYVL	3
HARTSVILLE	11
HEMINGWAY	3
HENDERSNVL	1
HILTONHEAD	23
HOLLYWOOD	3
HUGER	1
ISLE PALMS	4
JAMESTOWN	1
JEFFERSON	1
JOHNSONVL	6
KINGSTREE	5
LAKE CITY	5
LAKE VIEW	3

RATE CENTER TABLE

STATE: SOUTH CAROLINA

NPA: 843

NXX Data as of 12/31/2012

Rate Center Name	Count of NXXs
LAKEWOOD	4
LAMAR	1
LANE	1
LATTA	3
LAUREL BAY	4
LEBANON	1
LODGE	1
LORIS	5
LOWCOUNTRY	5
MACEDONIA	1
MARION	10
MCBEE	1
MCCOLL	3
MCLELLANVL	1
MONCKS COR	9
MTPLEASANT	14
MULLINS	3
MURELSINLT	5
MYRTLE BCH	54
NEWTONVL	2
NICHOLS	3
NMYRTLEBCH	10
NO CONWAY	5
NOKINGSTRE	3
NWALTERBOR	5
OLANTA	2
PAGELAND	4
PAMPLICO	1
PATRICK	1
PAWLEYS IS	4
PINEVILLE	1
RIDGELAND	7
ROWLAND	2
RUBY	1
SCRANTON	4
SO CONWAY	4
SOCIETY HL	3
ST GEORGE	5
ST HELENA	6
ST STEPHEN	2
SULLIVNSIS	3

RATE CENTER TABLE

STATE: SOUTH CAROLINA

NPA: 843

NXX Data as of 12/31/2012

Rate Center Name	Count of NXXs
SUMMERVL	14
SWALTERBOR	1
TIMMONSVL	3
TURBEVILLE	3
W ANDREWS	2
WALTERBORO	8
WAMPEE	4
WILLIAMS	1
WMYRTLEBCH	17
YEMASSEE	2

CODE HOLDER TABLE

STATE: SOUTH CAROLINA

NPA: 843

OCN Data as of 12/31/2012

OCN Name	OCN	Codes
AAA COMMUNICATIONS LTD	6019	1
ALEC, LLC - SC	217F	1
AT&T LOCAL	7421	5
BANDWIDTH.COM CLEC, LLC - SC	077F	4
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL &	9417	137
BERKELEY CABLE TELEVISION INC DBA HOME TELECOM-	712C	2
BLUFFTON TELEPHONE CO., INC.	0512	6
BUSINESS TELECOM INC. - SC	8688	2
CELLCO PARTNERSHIP DBA VERIZON WIRELESS - SC	6398	92
COMCAST PHONE OF SOUTH CAROLINA, INC. - SC	4730	4
CRICKET COMMUNICATIONS, INC.	6017	12
DELTACOM, INC. - SC	4621	30
EMBARQ COMMUNICATIONS, INC DBA CENTURYLINK	022E	1
FARMERS TELEPHONE COOPERATIVE, INC.	0520	9
FRONTIER COMMUNICATIONS OF THE CAROLINAS INC -	4335	56
FTC DIVERSIFIED SERVICES, INC.	4255	5
HALO WIRELESS, INC	429F	2
HARGRAY TELEPHONE CO., INC.	0523	12
HARGRAY, INC.-SC	5385	5
HOME TELEPHONE ILEC, LLC	0527	10
HORRY TELEPHONE COOPERATIVE, INC.	0528	24
HORRY TELEPHONE COOPERATIVE, INC. - SC	8960	6
INTERMEDIA COMMUNICATIONS INC. - SC	8534	3
KNOLOGY OF SOUTH CAROLINA, INC.	6093	2
LEVEL 3 COMMUNICATIONS, LLC - SC	5258	34
MCCLELLANVILLE TELEPHONE CO., INC.	0533	2
MCI WORLDCOM COMMUNICATIONS, INC. - SC	288B	1
NEUTRAL TANDEM-SOUTH CAROLINA, LLC - SC	548E	1
NEW CINGULAR WIRELESS PCS, LLC - GA	6214	33
NEXTEL COMMUNICATIONS, INC.	6232	20
NUVOX COMMUNICATIONS	8660	17
P.V. TEL, LLC	8613	1
PALMETTO RURAL TELEPHONE COOPERATIVE, INC.	0536	7
PALMETTO TELEPHONE COMMUNICATIONS, LLC - SC	154C	2
POWERTEL ATLANTA LICENSES, INC.	7473	5
SANDHILL TELEPHONE COOPERATIVE, INC.	0546	9
SBC INTERNET SERVICES, INC.	516C	5

CODE HOLDER TABLE

STATE: SOUTH CAROLINA

NPA: 843

OCN Data as of 12/31/2012

OCN Name	OCN	Codes
SOUTH CAROLINA NET, INC. - SC	1784	2
SPRINT COMMUNICATIONS COMPANY, L.P. - SC	8741	22
SPRINT SPECTRUM L.P.	6664	17
ST STEPHEN TELEPHONE CO.	0544	3
SUNCOM DBA T-MOBILE USA	8645	36
TC SYSTEMS, INC. - SC	635C	2
TELCOVE OF SOUTH CAROLINA, INC. - SC	7235	2
TELECOM SERVICES OF THE LOWCOUNTRY, LLC - SC	114D	3
TW TELECOM OF SOUTH CAROLINA LLC - SC	5344	2
UNITED STATES CELLULAR CORP. - SOUTH CAROLINA	6281	4
UNITED TELEPHONE CO CAROLINAS DBA CENTURYLINK	0506	16
US LEC OF SOUTH CAROLINA INC	8693	11
USA MOBILITY WIRELESS, INC.	6630	11
YMAX COMMUNICATIONS CORP. - SC	364E	3

843 NPA - RELIEF ALTERNATIVES

South Carolina

Numbering Plan Area Born on Date: March 22, 1998

NPA RELIEF PLANING TOOL ASSUMPTIONS

NRUF DATE..... October 2012
PROJECTED EXHAUST DATE.....1Q2016
ANNUALIZED CODE DEMAND PROJECTION.....25
MONTHLY CO CODE DEMAND PROJECTION.....2.5
NXX Assignment dataDecember 30, 2012

CURRENT DIALING PLAN

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA)	7 digits (NXX-XXXX)
	Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX)
Toll call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

OVERLAY ALTERNATIVE

ALTERNATIVE #1 – ALL SERVICES DISTRIBUTED OVERLAY

A new NPA code would be assigned to the same geographic area occupied by the existing 843 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers within and between NPAs in the affected area would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 843 NPA all future code assignments will be made in the overlay area code.

Total CO Codes = 701

Total rate centers = 92

Area Code Life in Years = 28

SPLIT ALTERNATIVE

ALTERNATIVE #2 – NPA SPLIT

If the 842 NPA is split into two geographic areas and the split boundary line runs west to east between Pineville and Greenville Rate Centers on the west and between Georgetown and McClellanville on the east. Area A is to the north of that line; Area B is to the south.

AREA "A"

Total CO Codes = 354

Total rate centers = 56

Area Code Life in Years = 29

AREA "B"

Total CO Codes = 357

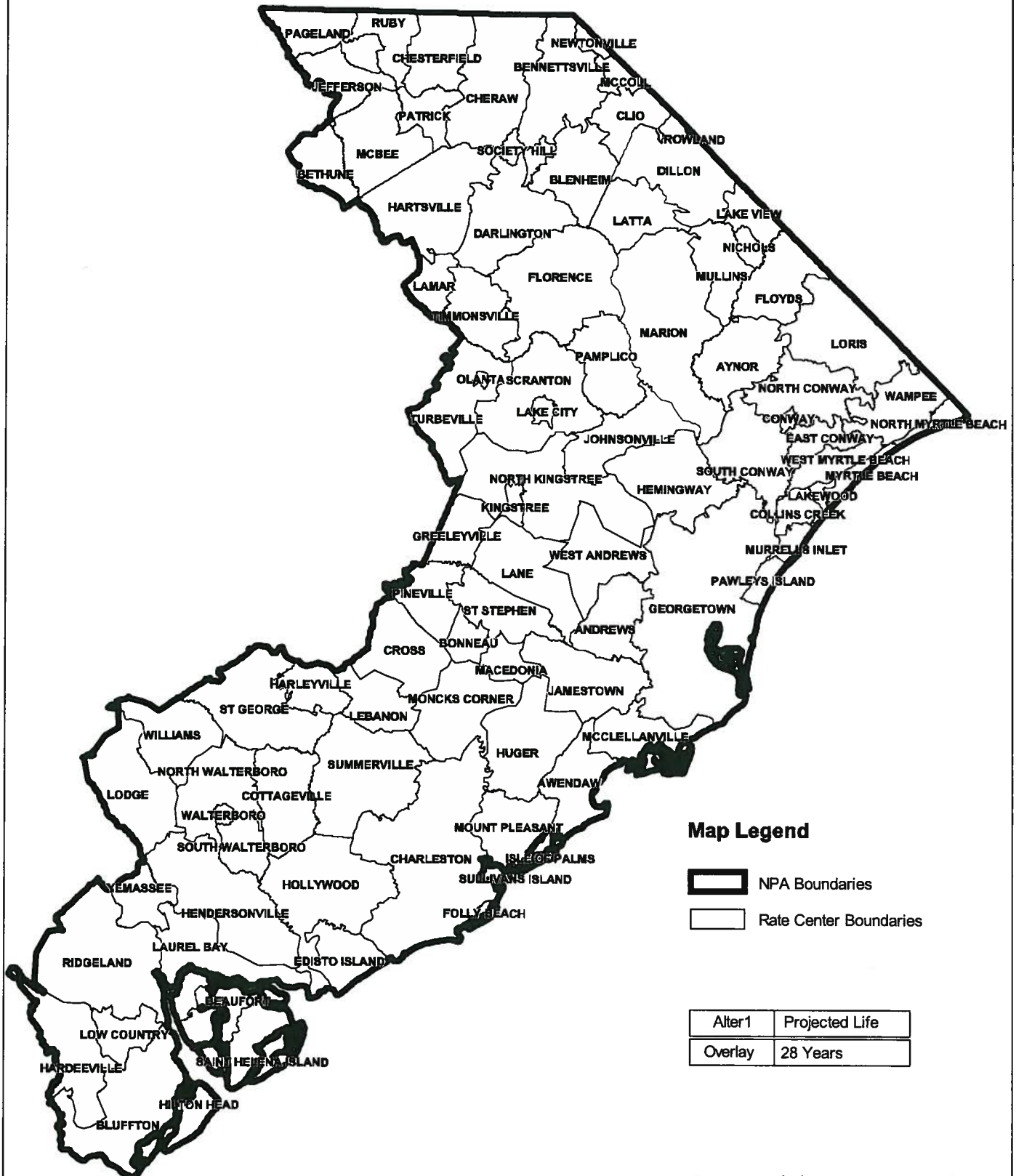
Total rate centers = 36

Area Code Life in Years = 27

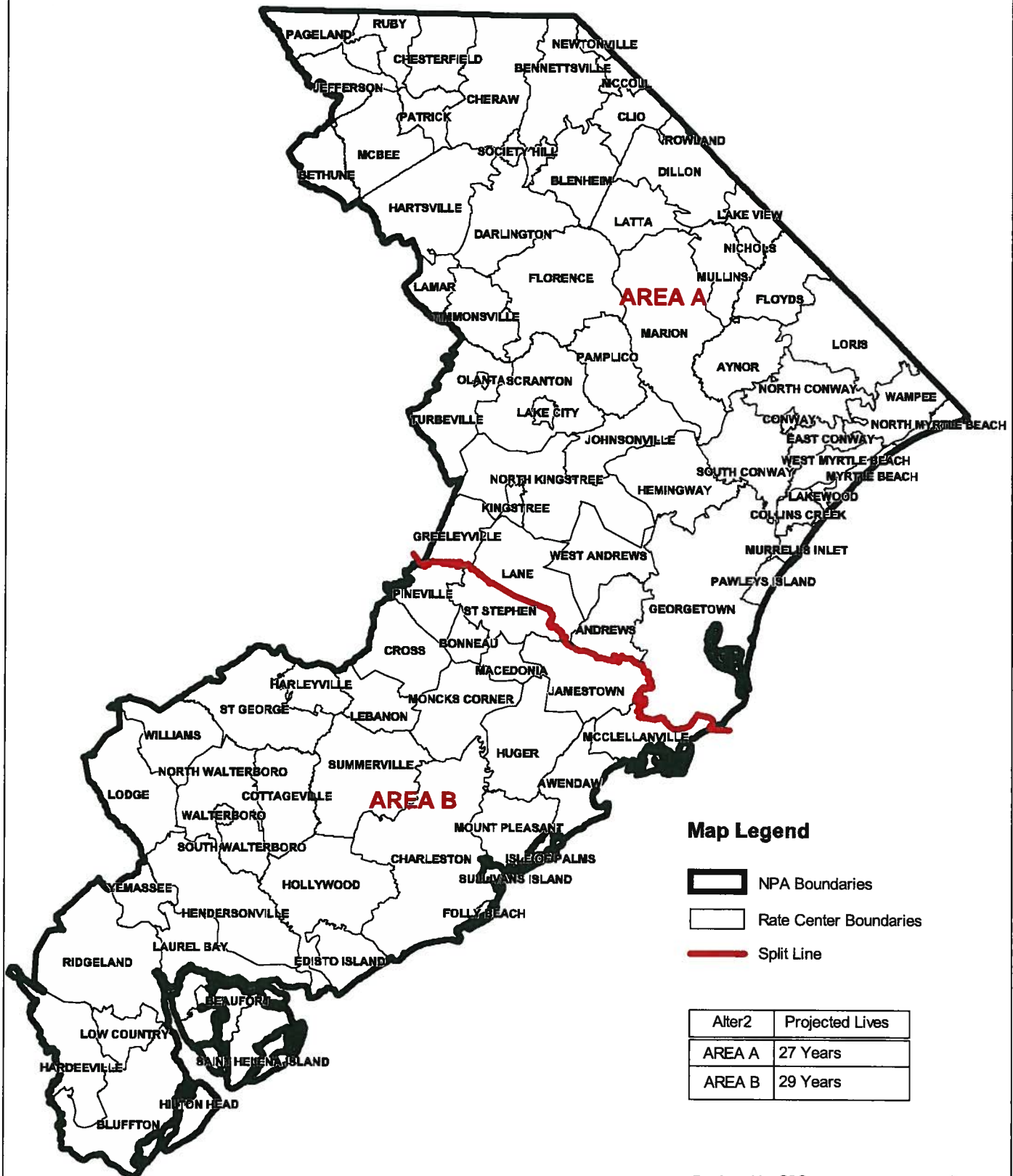
843 NPA - RELIEF ALTERNATIVES**South Carolina****PROJECTED LIVES OF RELIEF ALTERNATIVES****IN YEARS**

Alternative	Area A	Area B	Overlay
#1	-	-	28
#2	29	27	

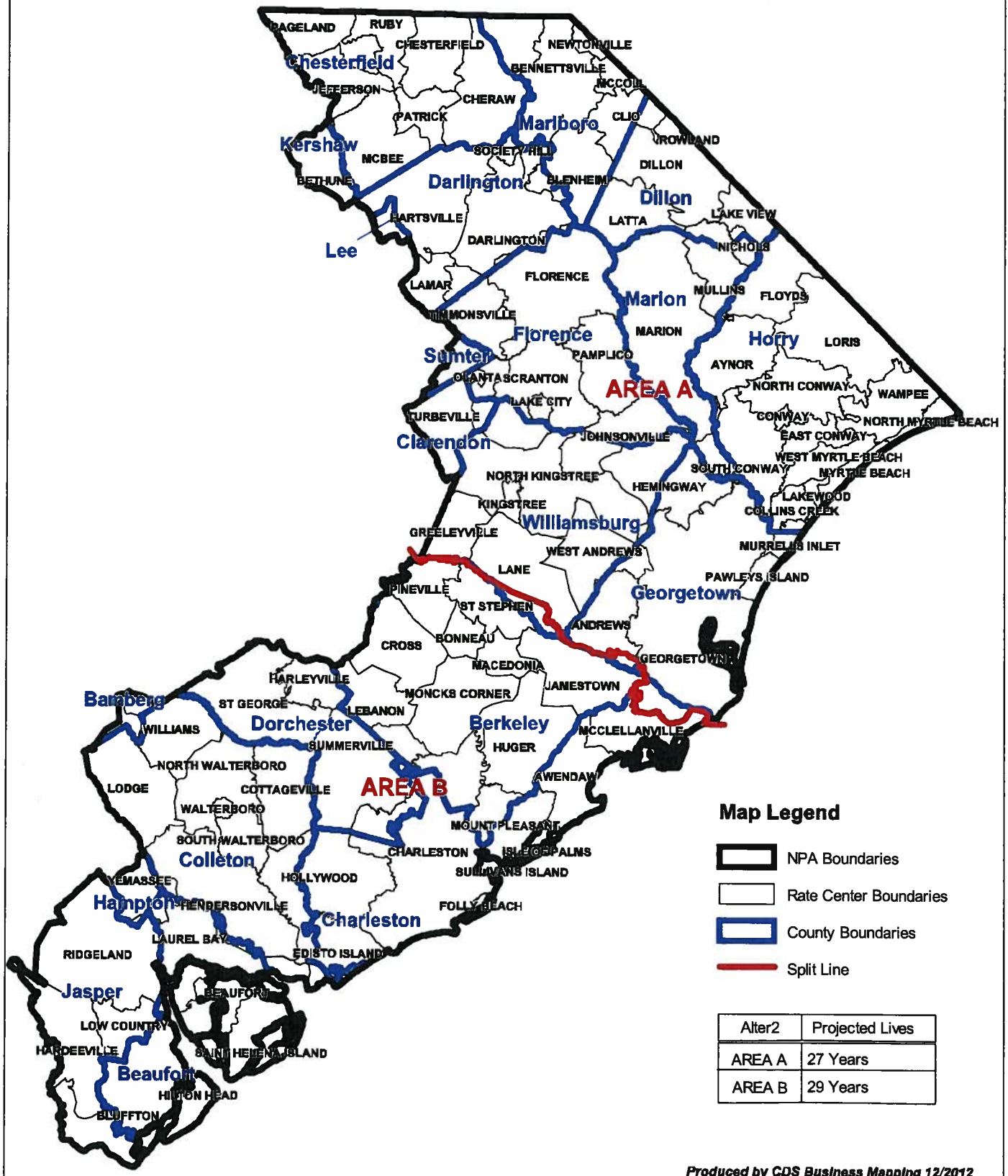
Alternative #1 Distributed Overlay



Alternative #2 Geographic Split



Alternative #2 Geographic Split



```

##          #          ##          ##
#          #          #
# ##### # #          ###          #          ## #####
# #          ## ## #          #          #          #
# ##          # # #          #          #          #
# #          # # #          #          #          #
# #          # # #          #          #          #
##          ##### ## #          #####          #####

```

```

      ###      #####
     #         #
    #         #
   #####     #####
  #           #
 #           #
#           #
#           #
#####       #####

```

EXHIBIT B



April 24, 2013

To: All 843 NPA Code Holders and Other Industry Members (South Carolina)

Subject: Final Minutes of 843 NPA Relief Planning Meeting

Attached are the final minutes from the March 21, 2013, South Carolina 843 NPA relief planning meeting.

On April 18, 2013 the industry approved these minutes with only minor cosmetic changes.

Please feel free to contact me if you have any questions regarding this document, any aspect of relief planning, or have any questions about receiving notices and documents via NNS. I can be reached on (571) 434-5726 or via email at the address below.

Sincerely,

A handwritten signature in black ink that reads "Thomas C. Foley". The signature is written in a cursive, flowing style.

Thomas C. Foley
Senior Manager- Data Analysis
NANPA
e-mail: thomas.foley@neustar.biz

Attachments

**SOUTH CAROLINA – 843 NPA
INITIAL RELIEF PLANNING MEETING
VIA CONFERENCE CALL
FINAL MINUTES
March 21, 2013**

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Thomas Foley, Senior Manager – Data Analysis - NANPA welcomed the participants and reviewed the objective of the meeting. A list of attendees can be found in Attachment 1. Tom mentioned there would be a quality survey sent via email to those attending today's call. Tom then reviewed the agenda and NANPA's role and responsibilities.

NANPA's ROLE AND RESPONSIBILITIES

Tom reviewed NANPA's role and responsibilities for today's meeting as follows:

- NANPA starts the relief planning process 36 months prior to exhaust of the NPA. (The October 2012 NRUF projects the 843 NPA will exhaust 1Q2016.)
- Facilitate a Pre-IPD conference call with the industry six weeks prior to the NPA Relief Planning meeting.
- Distribute the Initial Planning Document (IPD) at least four weeks prior to the Relief Meeting.
- Review the relief alternatives presented in the IPD
- Check to see if there are any additional relief alternatives from the participants
- Discuss the alternatives and list some pros and cons for each alternative
- Then, through a process of elimination of all but one alternative, the main objective is achieved by reaching consensus on the relief alternative the industry wants to recommend to the SC PSC.
- Also determine any additional items to include in a filing with the SC PSC such as dialing plan and implementation intervals.
- Then NANPA is charged with the responsibility of filing a relief petition, on behalf of the industry, with the regulatory authority. Once the industry comes to consensus on what should be included in the filing, NANPA will file the legal document within six weeks of today's meeting or the date set by the Industry.

REVIEW CONSENSUS PROCESS AND NPA RELIEF PLANNING GUIDELINES

Tom stated that the ATIS (Alliance for Telecommunications Industry Solutions) approved industry consensus process would be followed. He reviewed the consensus process and explained how consensus is determined. In addition, Tom stated that the minutes would be comprised of consensus agreements, and that issues not captured by consensus could be expressed in the form of a Statement for the Record, which could be conveyed at any point during the meeting.

Tom reviewed the most pertinent items from the Industry Numbering Committee (INC) NPA Code Relief and Planning and Notification Guidelines for this meeting as follows:

- The NPA Relief Planning, as well as other relevant NPA assignment and relief guidelines, may be downloaded from the ATIS web site at: (www.atis.org/inc/incguides.asp).
- The most pertinent items in the guidelines concerning this meeting are the relief options/alternatives shall cover a period of five years beyond the forecasted exhaust of the existing area code.
- If there is a split, it is recommended that customers who undergo number changes shall not be required to change again for a period of 8-10 years.
- The guidelines also state for split alternatives, that a difference in NPA lifetimes of more than 10 years shall be avoided.
- Relief should be in place at least three months prior to the exhaust of the existing NPA.

STATUS OF SOUTH CAROLINA 843 NPA

Beth Sprague, Regional Director – NANPA CO Code Administration, reviewed the status of the 843 NPA, which reflects a total of 710 NXX codes currently assigned. As of March 21, 2013, 68 NXX codes remain available for assignment in the 843 NPA, while 22 additional NXX codes are classified as unavailable (See Attachment 2). Also the October 2012 Number Resource Utilization Forecast (NRUF) projects exhaust of the 843 NPA during the First Quarter 2016.

The annual NXX code assignment history in the 843 NPA has been as follows:

2008 assignments: 19 codes

2009 assignments: 10 codes

2010 assignments: 11 codes

2011 assignments: 6 codes

2012 assignments: 7 codes

2013 assignments year to date: 8 codes

STATUS OF ONE-THOUSAND-BLOCK POOLING IN 843 NPA

Cecilia McCabe, NeuStar Number Pooling Implementation Manager, stated number pooling started in the 843 NPA on February 19, 2003. Out of the 92 rate centers, there are 12 rate centers that are mandatory pooling, 10 mandatory-single service provider rate centers, 62 rate centers that are optional pooling and 8 rate centers are excluded from pooling. There have been 235 blocks assigned in the last 12 months and 826 blocks are available as of March 21, 2013. Pooling has assigned 12 codes in the last twelve months; 4 for pool replenishment and 8 for LRNs. The forecasted need for codes for the next twelve months is 11 codes for pool replenishment. (See Attachment 3).

PRE-IPD CONFERENCE CALL RE-CAP

Tom provided a recap of the pre-IPD conference call held February 4, 2013. The purpose of this pre-IPD call was to solicit industry input on the proposed relief plans and to discuss additional alternative relief plans for consideration prior to the issue of the IPD. No additional relief alternative was suggested and added. Informal meeting notes

resulting from the pre-IPD industry conference were posted to NANPA's NAS-NNS service on February 11, 2013. Tom noted the main purpose of that call was to obtain additional relief alternatives for consideration and he stated the industry will still have the opportunity to propose additional relief alternatives during the call today. A reminder notice for today's call was sent on March 1, 2013 and included all pertinent documents.

REVIEW INITIAL PLANNING DOCUMENT (IPD) FOR THE 843 NPA

Tom reviewed the Initial Planning Document (IPD) distributed prior to the meeting.

General Information:

South Carolina was one of the original Thirteen Colonies. It became a state on May 23, 1788 thus becoming the eighth state.

The 843 NPA covers the east costal area of South Carolina. The area includes all, or part of, 21 counties. It includes the cities of Charleston, Hilton Head, Myrtle Beach, and Florence. The NPA was placed in service in 1998. It was split from the 803 NPA. The 803 NPA had previously split in 1995 creating the 864 NPA in the west.

Tom then briefly reviewed Appendix E to the NPA Code Relief Planning Guidelines which provides the General Attributes of Common Relief Alternatives.

The following maps and related documents were then reviewed:

Map showing location of all NPAs in South Carolina

NPA 843 Rate Center Map

NPA 843 County Map

Rate Center Table

Code Holder Table

Tom stated the IPD includes an all services distributed overlay (Alternative #1) and a two-way geographic split alternative (Alternative #2). He reviewed them as follows:

OVERLAY ALTERNATIVE

ALTERNATIVE #1 – ALL SERVICES DISTRIBUTED OVERLAY

A new NPA code would be assigned to the same geographic area occupied by the existing 843 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers within and between NPAs in the affected area would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 843 NPA all future code assignments will be made in the overlay area code.

Total CO Codes = 701

Total rate centers = 92

Area Code Life in Years = 28

NPA SPLIT ALTERNATIVE

ALTERNATIVE #2 – NPA SPLIT

If the 843 NPA is split into two geographic areas and the split boundary line runs west to east between Pineville and Greeleyville Rate Centers on the west and between Georgetown and McClellanville on the east. Area A is to the north of that line; Area B is to the south.

AREA “A”

Total CO Codes = 354

Total rate centers = 56

Area Code Life in Years = 29

AREA “B”

Total CO Codes = 357

Total rate centers = 36

Area Code Life in Years = 27

DISCUSSION OF PROS AND CONS OF RELIEF ALTERNATIVES

A general discussion ensued regarding the Pros and Cons of each relief alternative and the industry agreed to the following:

The following Pros and Cons were listed for the Alternatives:

Overlay Pros and Cons:

Pros:

Alternative #					
				1	
			X	1	All existing customers would retain the 843 area code and would not have to change their telephone numbers.
			X	2	Does not discriminate against customers on different sides of a boundary line as does a geographic split
			X	3	Easier education process
			X	4	Less customer confusion and easier education process
			X	5	Less financial impact to business customers because there is no need to change signage, advertising and stationery
			X	6	Provides the most efficient distribution of numbering resources by allowing assignments to follow demand not withstanding forecasts for growth
			X	7	No need for synchronization of old and new NPAs in NPAC databases
			X	8	Minimizes call routing issues, especially with ported numbers
			X	9	Easier for service providers to implement from a translations, billing and service order system perspective
			X	10	Minimal data entries handled in national databases such as BIRRDS, LERG and the Terminating Point Master Table
			X	11	The PSC/PUC would not have to decide which side gets the new NPA, so no winners and losers.

				X	12 Does not split cities or counties into different area codes.
				X	13 Keeps communities of interest in tact.
				X	14 No impact on some wireless carriers that have to reprogram handsets manually
				X	15 No technical impacts to number portability, text messaging or multimedia messaging
				X	16 No impact to non-telephone company databases that use the full ten-digit telephone number as a search criteria, i.e. airlines, doctors, utilities, grocery reward programs, pharmacies, National Missing Children Database, etc.

Overlay Pros and Cons:

Cons:

Alternative #					
				1	
				X	1 Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the 843 NPA and the new NPA.

NPA Split Pros and Cons

Pros:

Alternative #					
				2	
				X	1 Maintains seven digit dialing for local calls within the same NPA
				X	2 Approximately ½ of customers would experience no change if they keep the 843 NPA
				X	3 Projected lives are balanced
				X	4 Retains the geographic identity with one area code.

NPA Split Pros and Cons:

Cons:

Alternative #					
				2	
				X	1 Requires half of the businesses to incur costs to change their advertising for telephone #'s and stationery.
				X	2 Difficult PSC/PUC decision on which side retains the old NPA.
				X	3 More complicated and costly to implement for service providers in their billing, translations and database systems.

				X	4 Negative impacts to E911, industry and alarm system databases that must be updated with customers' new telephone numbers.
				X	5 Negative impact to directories and directory assistance databases that must be updated with customers' new telephone numbers.
				X	6 Negative impact to directories and directory assistance databases and other non-telephone company databases that use the full ten-digit telephone number as a search criteria, i.e. airlines, doctors, utilities, grocery stores, pharmacies and the National Missing Children's database that must be updated with customers' new telephone numbers.
				X	7 Timing of publication of telephone directories must be coordinated with the implementation of the new NPA.
				X	8 Split has a larger impact to greater number of existing customers due to change in existing customers' telephone numbers.
				X	9 Split requires significant challenges to service provider's operational support systems and network elements.
				X	10 Splits cause customer confusion with caller ID during implementation.
				X	11 Splits require the old and new NPAs to be synchronized with the NPAC database to ensure accurate call routing and facilitation of port requests.
				X	12 Splits require a more challenging customer education process for service providers that have customers on both sides of the split line.
				X	13 This split disrupts the SP's host-remote switch arrangement.
				X	14 Splits require the 800/SMS database to be updated.
				X	15 Splits reduce the geographic area served by one area code.
				X	16 For some wireless carriers, text messaging and multimedia service can only handle one version of the 10-digit number so they will fail if they are sent using the old area code during permissive dialing.

CONSENSUS ON ELIMINATION OF RELIEF ALTERNATIVES

After discussion and review of the above listed Pros and Cons, proposals were made and consensus reached to eliminate Alternative #2 due to cons listed above.

CONSENSUS ON RELIEF ALTERNATIVE RECOMMENDATION

After further discussion, a proposal was made and consensus was reached to recommend Alternative #1, the all services distributed overlay alternative, to the South Carolina Public Service Commission as the industry's preferred method of relief for the 843 NPA.

CONSENSUS ON DIALING PLAN (ALTERNATIVE #1)

Consensus was reached to recommend the following dialing plan for Alternative #1:

OVERLAY DIALING PLAN FOR ALTERNATIVE #1

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) or Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX)*
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

*1+10 digit permissible at each service provider's discretion

CONSENSUS ON IMPLEMENTATION INTERVALS

A recommendation was made and consensus reached to recommend to the Commission a 13-month schedule for implementation of the overlay.

The recommended schedule is as follows:

OVERLAY IMPLEMENTATION SCHEDULE FOR ALTERNATIVE #1

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period (Calls within 843 NPA can be dialed using 7 or 10 digits) Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
First Code Activation after end of Permissive dialing period (Effective date for codes from the new NPA)	1 month (after Mandatory Dialing Period)
Total Implementation Interval	13 months

STATEMENTS FOR THE RECORD

No statements for the record were submitted.

NANPA FILING INDUSTRY EFFORTS WITH SOUTH CAROLINA PSC

Consensus was reached that NANPA will prepare a draft of the petition that will be filed with the South Carolina Public Service Commission informing them of the outcome of this relief meeting. The draft filing will be reviewed by the industry on the conference call that will be held to approve these minutes. The INC guidelines reflect the relief petition is to be filed with the regulator within 6 weeks of the initial relief planning meeting unless otherwise agreed.

REVIEW OF DRAFT MEETING MINUTES

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the industry by April 4, 2013. Consensus was also reached to conduct a conference call to review and approve the draft minutes April 18, 2013.

Details of the call are as follows:

Date: April 18, 2013

Time: 2:00 PM ET; 1:00 PM CT; 12:00 PM MT; 11:00 AM PT

Dial-in number: 630-827-6799

Pass code: 8831535#

Adjourned

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On April 18, 2013 these minutes became final with minor changes.

ATTACHMENT 1

**SOUTH CAROLINA – 843 NPA
INITIAL RELIEF PLANNING MEETING
Meeting Attendees
March 21, 2013**

NAME	COMPANY
George Guerra	AT&T
Mary Ann Palmisano	AT&T
Paula Hustead	Century Link
Bruce Bennett	CenturyLink
Rita Schmitz	CenturyLink
Ray Rosales	CenturyLink
Dena Hunter	Cricket Communications
Michael Welch	Farmers Telephone Coop
Mayme Carston	Farmers Telephone Coop
Sandra Moore	Farmers Telephone Coop
Sammy Hood	Home Telephone Coop
Bob Abbott	Home Telephone Coop
Frank Sarvis	Horry Telephone Coop
Bridget Alexander	JSI (John Staurulaksi Inc.)
Joe Cocke	NANPA Relief Planning
Thomas Foley	NANPA Relief Planning
Beth Sprague	NANPA CO Code Admin
Linda Hymans	Neustar Pooling Regulatory
Cecilia McCabe	Neustar Pooling Implementation
Valerie Ancrum	Palmetto Rural Telephone Coop
Dan Meldazis	Peerless Network
James McDaniel	South Carolina Office of Regulatory Staff
Shaunna Forshee	Sprint
Paul Nejedlo	TDS Telecom
Allyson Blevins	Time Warner Cable
Josefina Musquiz	TW Telecom
Natalie McNamer	T-Mobile
Yun Lee	Verizon Business
Dana Crandall	Verizon Wireless

Attachment 2
South Carolina
NPA 843 NXX Summary
Data as of March 21, 2013

NPA	843					
Assigned NXXs	710					
Protected NXXs	0					
Reserved NXXs	0					
Unavailable NXXs	22	See Note				
Available NXXs	68					
Total	800					
<u>Codes Assigned NPA 843</u>	<u>Jan 08</u>	<u>Feb 08</u>	<u>Mar 08</u>	<u>Apr 08</u>	<u>May 08</u>	<u>Jun 08</u>
	2	0	1	1	2	3
	<u>Jul 08</u>	<u>Aug 08</u>	<u>Sep 08</u>	<u>Oct 08</u>	<u>Nov 08</u>	<u>Dec 08</u>
	2	0	4	2	1	1
	<u>Jan 09</u>	<u>Feb 09</u>	<u>Mar 09</u>	<u>Apr 09</u>	<u>May 09</u>	<u>Jun 09</u>
	0	4	1	2	0	0
	<u>Jul 09</u>	<u>Aug 09</u>	<u>Sep 09</u>	<u>Oct 09</u>	<u>Nov 09</u>	<u>Dec 09</u>
	0	0	0	0	0	3
	<u>Jan 10</u>	<u>Feb 10</u>	<u>Mar 10</u>	<u>Apr 10</u>	<u>May 10</u>	<u>Jun 10</u>
	2	3	0	2	0	1
	<u>Jul 10</u>	<u>Aug 10</u>	<u>Sep 10</u>	<u>Oct 10</u>	<u>Nov 10</u>	<u>Dec 10</u>
	2	0	0	0	1	0
	<u>Jan 11</u>	<u>Feb 11</u>	<u>Mar 11</u>	<u>Apr 11</u>	<u>May 11</u>	<u>Jun 11</u>
	0	1	0	1	0	0
	<u>Jul 11</u>	<u>Aug 11</u>	<u>Sep 11</u>	<u>Oct 11</u>	<u>Nov 11</u>	<u>Dec 11</u>
	0	1	0	3	0	0
	<u>Jan 12</u>	<u>Feb 12</u>	<u>Mar 12</u>	<u>Apr 12</u>	<u>May 12</u>	<u>Jun 12</u>
	0	1	3	0	0	0
	<u>Jul 12</u>	<u>Aug 12</u>	<u>Sep 12</u>	<u>Oct 12</u>	<u>Nov 12</u>	<u>Dec 12</u>
	0	0	1	1	0	1
	<u>Jan 13</u>	<u>Feb 13</u>	<u>13-Mar</u>			
	5	1	2 *			
* through 3/21/13						
Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950) and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).						

ATTACHMENT 3

POOLING STATISTICS <i>Provided By: Cecilia McCabe</i>	
ST/NPA:	SC 843
MEETING DATE:	3/21/2013
MEETING SUBJECT:	
<i>Relief Planning</i>	X
<i>Jeopardy</i>	
<i>Jeopardy Status Review</i>	
<i>Other</i>	
POOL START DATE (PSD)	2/19/2003
RATE CENTERS	
<i># Total</i>	92
<i># Mandatory</i>	12
<i># Mandatory-Single Service Providers (M*)</i>	10
<i># Optional</i>	62
<i># Excluded</i>	8
BLOCKS ASSIGNED	
<i># Total</i>	235
<i>(For time period 03/01/12 - 03/20/13)</i>	
BLOCKS AVAILABLE	
<i>#Total</i>	826
<i>(As of preparation date: 03/20/13)</i>	
CODES ASSIGNED	
<i># Total</i>	12
<i># for Pool Replenishment</i>	4
<i># for Dedicated Customers</i>	0
<i># for LRNs</i>	8
<i>(For time period 03/01/12 - 03/20/13)</i>	
CODES FORECASTED	
<i># Total</i>	11
<i># for Pool Replenishment and Dedicated Customers</i>	11
<i># for LRNs</i>	0
<i>(For the next twelve months as of: 03/20/13)</i>	